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October 27, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

RE: In the Matter of Policies and Rules Implementing the Telephone Disclosure and
Dispute Resolution Act, CC Docket No. 93-22/(RM-7990)

Dear Mr. Caton:

Enclosed for filing by ALLTEL Service Corporation on behalf of its affiliated telephone operating companies are an original and nine copies of its Comments in Support of AT&T's Petition for Limited Interim Waiver on an Expedited Basis filed October 20, 1993 in the captioned proceeding.

Should there be any questions concerning this matter, please contact the undersigned counsel.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carolyn Hill".

Carolyn C. Hill
Federal Regulatory Counsel

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Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of

Policies and Rules Implementing
the Telephone Disclosure and
Dispute Resolution Act

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CC Docket No. 93-22
RM-7990

**ALLTEL Service Corporation's Comments in Support of
AT&T's Petition for Limited Interim Waiver on an Expedited Basis**

ALLTEL Service Corporation, on behalf of its affiliated telephone operating companies (hereinafter "ALLTEL") hereby submits its comments in support of the American Telephone and Telegraph Company's (AT&T) Petition for Limited Interim Waiver on an Expedited Basis (Petition) filed October 20, 1993 in the captioned proceeding.

Background

In response to the requirements of the Telephone Disclosure and Dispute Resolution Act (TDDRA), the FCC adopted various rules relating to the role of common carriers in the provision of interstate pay-per-call-services.¹ Among other things, these rules contain requirements relating to billing and collection of pay-per-call charges. See 47 C.F.R. §64.1510.

¹ Policies and Rules Implementing the Telephone Disclosure and Dispute Resolution Act, CC Docket No. 93-22, RM-7990, Report and Order, FCC 93-349, released August 13, 1993 (TDDRA Order).

ALLTEL does not provide pay-per-call services or bill directly on behalf of pay-per-call providers. However, it does provide billing and collection services to various interexchange carriers, including AT&T, which may include pay-per-call charges. It is because of the billing and collection services provided to AT&T and other interexchange carriers that ALLTEL is impacted by the billing system and disclosure requirements adopted by the Commission in its TDDRA Order.

There are 32 ALLTEL telephone companies operating in 25 states, and they serve over 1.3 million access lines. Currently, there are four local billing systems² utilized in billing our local telephone subscribers. ALLTEL's four billing systems are the Customer Account Maintenance System (CAMS), Customer Reporting System (CRS), Distributed Information System - Service Order Codes (DISOC) and the Telephone Friendly System (TFS), a third party vendor billing system.

CAMS is used to bill customers in ALLTEL's Northeast Region. CRS is used to bill customers in ALLTEL's Southwest Region. DISOC is used to bill customers in ALLTEL's Southern Region and Western Division. TFS is used for Sugar Land Telephone Company exclusively and is maintained by NYNEX-DPI, a third party billing service vendor. ALLTEL continues its contractual relationship with NYNEX-DPI for TFS system maintenance pending conversion to CAMS, ALLTEL's primary local billing system.

² ALLTEL is in the process of converting to one local billing system for its operations. ALLTEL's surviving local billing system will be the Customer Account Maintenance System (CAMS). Because of the individual state requirements necessary for implementation, however, full conversion to CAMS is not anticipated until late 1995.

In addition to ALLTEL's existing local billing systems, there will be two other billing systems utilized to serve ALLTEL customers in the state of Georgia, effective November 1, 1993. In this regard, it should be noted that on April 5, 1993, ALLTEL Corporation and GTE Corporation entered into various agreements to exchange certain of their telephone subsidiary assets with each other. Under these agreements, GTE will assign all of its assets in Georgia to ALLTEL in exchange for ALLTEL's telephone assets in the states of Illinois, Indiana and Michigan. This transaction is scheduled for completion on November 1, 1993. Currently, the Georgia customers affected by this transaction are billed by GTE's local billing systems. These systems will be converted to CAMS effective on February 1 (System 1) and May 1, 1994 (System 2). Until conversion, ALLTEL has contracted with GTE to continue local billing services on behalf of ALLTEL. It is ALLTEL's understanding that these GTE billing systems will not be able to comply with the Commission's TDDRA Order by November 1, 1993. ALLTEL's implementation of the provisions of Section 64.1510 of the Commission's Rules with the respect to the newly acquired Georgia customers is dependent on when GTE's billing systems can comply with the requirements of Section 64.1510. It is ALLTEL's understanding that the GTE billing systems can comply by February 1, 1994.

ALLTEL has conscientiously sought to comply with the Commission's TDDRA requirements resulting from its billing and collection services for AT&T and other interexchange carriers. Specifically, disclosure notifications³ have been initiated in all

³ See 47 CFR §64.1509(b)(2)

local billing systems for bills sent October 16 through November 15.⁴ ALLTEL has filed interstate access tariff terms and conditions for the provision of 900 blocking in conformance with Section 64.1508.⁵ ALLTEL will also implement the billing system changes required by Section 64.1510(a)(2)(i) in its CAMS and CRS systems by November 1, 1993. Further, ALLTEL will implement the bill changes required by Section 64.1510(a)(2)(ii) of the Commission's Rules in the CAMS billing system on November 1, 1993.

However, unlike CAMS, ALLTEL's other local billing systems are not table driven and require extensive programming and testing for any changes to the local bill.⁶ It is anticipated that the ALLTEL's DISOC and CRS billing systems will be in full compliance with the Commission's requirements by January 1, 1994. Based on the response received from our billing vendor for the TFS system, compliance will be achieved by April 1, 1994. Finally, compliance with respect to the two billing systems which will be used to serve the former GTE/Contel customers in Georgia will be achieved by February 1, 1994.

⁴ The disclosure statements associated with the GTE systems will begin November 1, 1993 for completion by late November.

⁵ ALLTEL Telephone System, Tariff F.C.C. No. 1, Transmittal No. 16, filed September 17, 1993, effective November 1, 1993. NECA, Tariff F.C.C. No. 5, Transmittal No. 570, filed September 17, 1993, effective November 1, 1993.

⁶ CAMS is a table driven system that allows for adjustments to billing through changes to data bases rather than detailed programming efforts. As a result, the changes required by the Commission's TDDRA Order can be accommodated with minimal programming and testing. DISOC, CRS and the TFS billing system are not table driven and will require extensive programming efforts to accommodate the required changes.

Listed below are the compliance dates and percentages of ALLTEL access lines served by each of ALLTEL's local billing systems, effective November 1, 1993. These percentages are based on July 1993 access line counts.

**Compliance Data for the
ALLTEL Telephone Companies' Billing Systems**

SYSTEM	PERCENTAGE OF CUSTOMERS SERVED	COMPLIANCE DATES
CAMS	37%	November 1, 1993
CRS	12%	January 1, 1994
DISOC	27%	January 1, 1994
TFS	3%	April 1, 1994
GTE System 1 (GTE GA)	16%	February 1, 1994
GTE System 2 (Contel GA)	5%	February 1, 1994

Conclusion

For the reasons stated above, ALLTEL respectfully requests that the Commission grant AT&T's Petition and allow implementation of the schedule set forth herein with respect to ALLTEL's DISOC, CRS, and TFS billing systems and the two billing systems to be used to serve its new Georgia subscribers.

Respectfully submitted,

ALLTEL Service Corporation

A handwritten signature in cursive script, appearing to read "Carolyn Hill", is written over a horizontal line.

Carolyn C. Hill
1710 Rhode Island Avenue NW, Suite 1000
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Its Attorney

October 27, 1993

Certificate of Service

I, Rita P. Ferrando, do hereby certify that on this 27th day of October, 1993, copies of the foregoing pleading were served by hand or by United States Mail, postage prepaid, to those persons on the attached service list.


Rita Ferrando

October 27, 1993

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